

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

**DECLARATION OF DAVID C. RYBICKI IN SUPPORT OF DEFENDANT  
VADIM WOLFSON'S MOTION *IN LIMINE* TO EXCLUDE GOVERNMENT'S  
EXPERT TESTIMONY**

Pursuant to 28 U.S.C. § 1746, I, David C. Rybicki, declare under oath as follows:

1. I am a partner at K&L Gates LLP in Washington, D.C., and counsel to Vadim Wolfson.
2. I make this Declaration in support of Mr. Wolfson's Motion *in limine* to Exclude Government's Proposed Expert Testimony.
3. Annexed as Exhibit 1 hereto is a true and accurate copy of the Government's Rule 16(a)(1)(G) Disclosure of Experts Letter dated February 28, 2025, with Attachments: (1) Disclosure as to Expert Witness Dr. Louise Shelley, (2) Disclosure as to Expert Witness Robert J. Hanratty, and (3) Disclosure as to Expert Witness Alan Blake Santos.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 28, 2025  
Washington, D.C.

/s/ David C. Rybicki  
David C. Rybicki